

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

K.W., T.O., S.D., )  
 )  
Plaintiffs, ) Civil Action No. 1:25-cv-03201-TRJ  
v. )  
 )  
JANKI MOTEL, INC. ) JURY TRIAL DEMANDED  
 )  
Defendant. )

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**DEFENDANT'S NOTICE TO TAKE THE**  
**VIDEO DEPOSITION OF PLAINTIFF S.D.**

PLEASE TAKE NOTICE that on Wednesday, October 29, 2025, beginning at 10:00 a.m. at Andersen, Tate & Carr, P.C., One Sugarloaf Centre, 1960 Satellite Boulevard, Suite 4000, Duluth, Georgia 30097, the undersigned counsel for defendant will take the video deposition of S.D. pursuant to Rule 30 of the Federal Rules of Civil Procedure for all purposes authorized by law before a court reporter duly authorized to administer oaths. The deposition will be taken before a certified court reporter and videographer or some other officer duly authorized by law to take depositions and will continue from day to day, excluding Saturdays, Sundays, and holidays, until its completion.

This 22<sup>nd</sup> day of October, 2025.

[SIGNATURE ON FOLLOWING PAGE]

**FREEMAN MATHIS & GARY, LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically submitted the foregoing **DEFENDANT'S NOTICE TO TAKE THE VIDEO DEPOSITION OF PLAINTIFF S.D.** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Patrick J. McDonough  
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Anderson Tate & Carr  
*Attorneys for Plaintiffs*

This 22<sup>nd</sup> day of October, 2025.

<p><b>FREEMAN MATHIS &amp; GARY, LLP</b>  100 Galleria Parkway  Suite 1600  Atlanta, GA 30339-5948  (770) 818-0000 (telephone)  (833) 330-3669 (facsimile)</p>	<p><i>/s/ Emma J. Fennelly</i>  Jennifer C. Adair  Georgia Bar No. 001901  <a href="mailto:jadair@fmglaw.com">jadair@fmglaw.com</a>  Emma J. Fennelly  Georgia Bar No. 610587  <a href="mailto:emma.fennelly@fmglaw.com">emma.fennelly@fmglaw.com</a></p> <p><i>Attorneys for Defendant Janki Motel, Inc.</i></p>
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